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IN RE:

DOXINETTE RICHARDS,

Debtor.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Chapter: 13

Case No. 09-44835 MS

**NOTICE OF MOTION TO VACATE
AUTOMATIC STAY**

Hearing Date: May 6, 2010

TO: SHMUEL KLEIN
LAW OFFICE OF SHMUEL KLEIN
113 CEDARHILL AVENUE
MAHWAH, NJ 07430
Debtor's Attorney

MARIE-ANN GREENBERG, ESQ.
30 TWO BRIDGES ROAD
SUITE 330
FAIRFIELD NJ 07004
Trustee in Bankruptcy

DOXINETTE RICHARDS
49 UNION AVENUE
IRVINGTON, NJ 07111
Debtor

PLEASE TAKE NOTICE that on the 6TH day of May, 2010 at 11:00 a.m., in the forenoon or as soon thereafter as counsel may be heard, the undersigned, attorneys for the secured creditor, CHASE HOME FINANCE, LLC as servicer for U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR J.P. MORGAN MORTGAGE ACQUISITION TRUST 2006-NC1, ASSET BACKED PASS-THROUGH CERTIFICATES, SERIES 2006-NC1, will

move before United States Bankruptcy Judge, Honorable Morris Stern, 50 Walnut Street, Newark, NJ 07102, for an Order Vacating the Automatic Stay, with respect to the Debtor's property located at 314 UNION AVE, IRVINGTON, NJ 07111, and allowing CHASE HOME FINANCE, LLC as servicer for U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR J.P. MORGAN MORTGAGE ACQUISITION TRUST 2006-NC1, ASSET BACKED PASS-THROUGH CERTIFICATES, SERIES 2006-NC1, to continue with its foreclosure action, by reason of the Debtor's failure to make the regular monthly payments outside of the Chapter 13 Plan.

Dated: April 14, 2010

FEIN, SUCH, KAHN & SHEPARD, PC.
Attorneys for Secured Creditor,
CHASE HOME FINANCE, LLC

By: /S/ MELISSA N. LICKER, ESQ.